Special Conditions for Municipal Dischargers



Permit Components

Industry-Specific Components of All Permits Components **Cover Page Effluent Limitations** Effluent Guidelines Secondary Technology-Based BPJ Water Quality-Based **Monitoring & Reporting** Requirements **Special Conditions** Compliance Schedules Storm Water Pretreatment Special Studies, Evaluations, and **CSOs** • BMPs Other Requirements **Standard Conditions**

Municipal-Specific Components

Equivalent to Secondary

Municipal Sewage Sludge



Learning Objectives

- Define pretreatment program requirements
- Define sewage sludge requirements
- Define combined sewer overflow requirements



Domestic Sewage Exclusion

- Domestic sewage or any mixture of domestic sewage and other wastes that pass through a sewer system to a POTW <u>are not</u> considered "solid waste" under RCRA...
- Unless received at the POTW by:
 - Truck
 - Rail
 - Dedicated pipeline

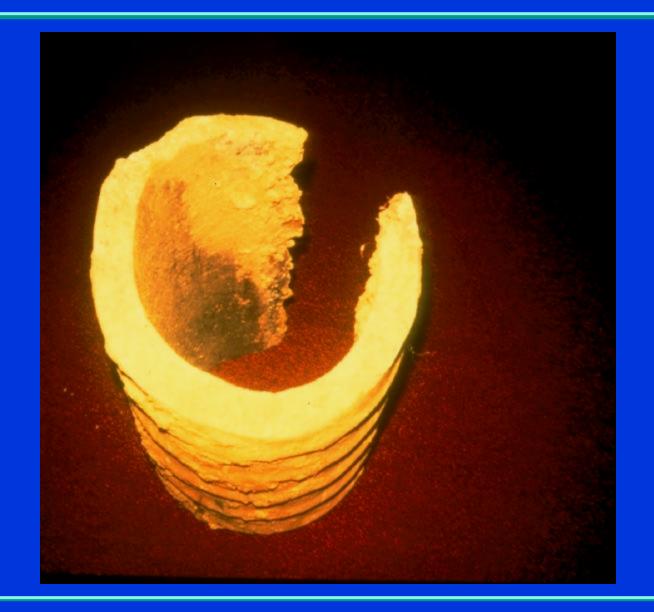


National Pretreatment Program

- Major goal is controlling discharges in order to:
 - Prevent interference with POTW processes
 - Prevent pass through of pollutants
 - Protect sludge management options
- Additional programmatic goals
 - Encourage recycling and reclamation
 - Ensure POTW personnel health and safety







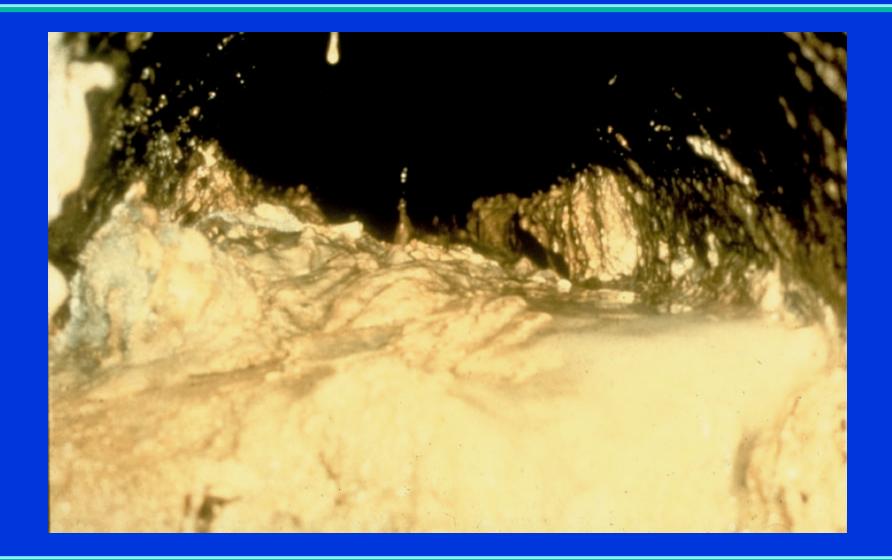












Regulatory Requirements – General Pretreatment Regulations (40 CFR PART 403)

Elements:

- National Pretreatment Standards
- Requirements for POTW and State programs
- Industrial and POTW reporting requirements
- Effluent Limitations Guidelines (40 CFR 405-471)
 - Including categorical pretreatment standards

Pretreatment Program Development

Who?

- POTWs > 5 MGD with dischargers subject to standards
- POTWs < 5 MGD with past problems
- Unless State assumes total responsibility for program implementation (403.10(e))

What?

- Legal authority
- Industrial user survey
- Individual control mechanisms for all SIUs
- Compliance/enforcement
- Resources
- Data management



NPDES Permits Drive the Pretreatment Program by Requiring:

- Adequate legal authority
- Maintaining industrial user inventory
- Development/implementation local limits
- Individual control mechanisms be issued to all SIUs
- Compliance monitoring activities



NPDES Permits Drive the Pretreatment Program by Requiring:

- Swift and effective enforcement
- Data management and recordkeeping
- Reporting to the approval authority (EPA or State)
- Public participation



Permits for Municipal Sewage Sludge (Biosolids)

- Any Section 402 permit issued to a POTW should contain requirements for sewage use and/or disposal
- 40 CFR Part 503 requirements should be incorporated into a permit for:
 - Incineration
 - Land application
 - Surface disposal



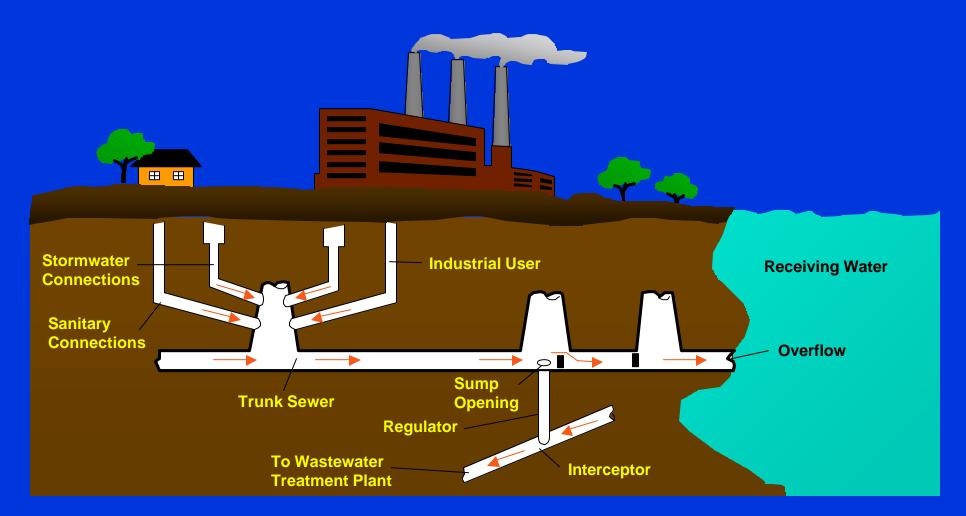


Permits for Municipal Sewage Sludge (Biosolids) (Continued)

- Other entities may be delegated responsibility to comply (40 CFR Part 503 standards and requirements may not all be placed in the POTW permit)
- Permits must contain:
 - Additional standard conditions
 - Special conditions



Typical Combined Sewer System Configuration





Requirements for Combined Sewer Overflows (CSOs)

- Technology-based requirements (BPJ)
 - BAT (none promulgated)
 - BCT (none promulgated)
- Applicable State water quality standards



Considerations for Developing Special Conditions for CSOs

- Characteristics of the discharge
- Control technologies
- CSO control policy



Overview of CSO Control Policy Approach

Years after Phase I Permit Issuance

	Time	0	5	
	NPDES Permit Requirements	Phase I	Phase II	Post Phase II
A.	Technology-Based	Nine minimum controls (NMC), at a minimum	• NMC, at a minimum	NMC, at a minimum
В.	Water Quality-Based	◆ Narrative	Narrative + performance- based standards	 Narrative + performance- based standards + numeric WQ- based effluent limits (as appropriate)
C.	Monitoring	 Characterization, monitoring, and modeling of CSS 	 Monitoring to evaluate WQ impacts Monitoring to determine effectiveness of CSO controls 	Post-construction compliance monitoring
D.	Reporting	 Documentation of NMC implementation Interim long-term control plan (LTCP) deliverables 	Implementation of CSO controls	 Post-construction compliance monitoring reporting
E.	Special Conditions	 Prohibition of dry weather overflows (DWO) Development of LTCP 	 Prohibition of DWO LTCP implementation schedule Reopener clause for WQS violations Sensitive area reassessment 	 Prohibition of DWOs Reopener clause for WQS violations 2004-2009
		1994 - 1999	1999-2004	⊕ FP/